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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JORGE ALEJANDRO ROJAS,
Plaintiff,
v.
UNPLUGGED MEDIA, LLC, et al,
Defendants.

Case No. 2:23-cv-02667-AH-KS

**DECLARATION OF JORGE
ALEJANDRO ROJAS IN
OPPOSITION TO DEFENDANT
CHRISTOPHER GUTIERREZ
CUENZA’S “REQUEST TO SET
ASIDE DEFAULT JUDGMENT”**

I, Jorge Alejandro Rojas, an adult of sound mind, declare as follows:

1. I am the Plaintiff in this case, and make the following statements based on my personal knowledge and records. If called to testify concerning any of these statements, I will be able to do so.
2. I make the statements in this declaration as part of my opposition to Defendant Christopher Gutierrez Cuenza’s (“Cuenza”) May 29, 2025 “Request to Set Aside Default Judgment” (Dkt. 114).
3. I have not consented to service via e-mail or other electronic means, other than for filings made by the filer directly into CM/ECF, for filings made by Cuenza.

- 1 4. I have not received an email from Cuenza which contained his May 29, 2025 filing.
2 I in fact received the filing via USPS First Class Mail.
- 3 5. I utilize Stamps.com to mail filings of court documents to defendants. My
4 Stamps.com account reflects that I mailed several filings to Cuenza with tracking
5 services provided by USPS. My Stamps.com account reflects that Dkt. 74 was
6 shipped to Christopher Gutierrez Cuenza 228 S Avenue 18 Apt E Los Angeles, CA
7 90031-2549, and delivered on September 17, 2024, with tracking number
8 9400111206205845453927. My Stamps.com account reflects that Dkt. 80 and 81
9 was shipped to Christopher Gutierrez Cuenza 228 S Avenue 18 Apt E Los Angeles,
10 CA 90031-2549, and delivered on October 8, 2024, with tracking number
11 9400111206205495140796. My Stamps.com account reflects that Dkt. 94 was
12 shipped to Christopher Gutierrez Cuenza 228 S Avenue 18 Apt E Los Angeles, CA
13 90031-2549, and delivered on November 19, 2024, with tracking number
14 9400111206205507893269. My Stamps.com account reflects that Dkt. 108, 109 was
15 shipped to Christopher Gutierrez Cuenza 228 S Avenue 18 Apt E Los Angeles, CA
16 90031-2549, and delivered on May 9, 2025, with tracking number
17 9400150206208001723215. This is in addition to other mailings that I made to
18 Cuenza utilizing non-delivery confirmation services. My Stamps.com account
19 reflects at least seven (7) other mailings that I made throughout the course of this
20 litigation to Cuenza of filings. Many of these mailings were made without any
21 requirement for me to do so following Cuenza's default in this case. I nevertheless
22 mailed him copies of the filings.
- 23 6. Exhibit 2 of my filing is a true and correct copy of an Instagram picture of Chris
24 Cuenza, posted on the account "cuenzascorner," dated May 19, 2025, which shows
25 Cuenza with hair that appears yellow or gold on the top – similar to how the
26 process server described when performing service. I obtained this image on June 8,
27 2025 from Instagram. I also obtained a link to this post which is available at:
28

1 <https://www.instagram.com/p/DJ2vbiESnMj/?igsh=MTBpZDNpMnhyNWY3cA=>
2 ≡.

- 3 7. Exhibit 3 of my filing are true and correct copies of pictures provided by the
4 process server via the service portal that ABCLegal (the process service company
5 utilized) as well as a GPS position of the service attempt. I obtained these
6 documents on June 8, 2025 via my account portal.
- 7 8. Exhibit 4 of my filing are true and correct copies of a search query performed in
8 my Stamps.com portal which I obtained on June 8, 2025 demonstrating that several
9 mailings were made to Cuenza and some were made with delivery tracking service,
10 and were in fact delivered.

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12 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
13 and correct. Executed on June 8, 2025, in Bolingbrook, IL.

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Jorge Alejandro Rojas

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